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**UNITED STATES DISTRICT COURT**

NORTHERN DISTRICT OF CALIFORNIA

EDUARDO I.T., EDWIN E.I.I., Ignacio P.G.,  
Leonel Y.P.G., a minor child, Benjamin J.R., and  
William A.J.M.

Plaintiffs,

vs.

UNITED STATES OF AMERICA

Defendant.

Case No. 4:22-cv-05333-DMR

**NOTICE OF ERRATA REGARDING  
CASE MANAGEMENT STATEMENT**

Honorable Donna M. Ryu

1 The parties respectfully submit this Notice of Errata regarding the Case Management Statement  
2 (ECF No. 43). The Case Management Statement contains two errors.

3 The first error occurs on page eight, lines four through six, which currently reads: "First, the  
4 parties agreed upon a discovery plan involving a close of fact discovery in approximately 16 months, to  
5 be followed by a period for expert discovery and then dispositive motions. The parties have agreed to  
6 the specific schedule listed in Section 16 below." As demonstrated in Section 16, the parties proposed  
7 different schedules for this case. Therefore, the parties revise that statement to the following: "The  
8 parties disagree on the length of fact discovery. Plaintiffs propose a discovery plan involving a close of  
9 fact discovery in approximately 13 months, while Defendant proposes to close fact discovery in  
10 approximately 16 months. The parties present their specific schedule proposals in Section 16 below."

11 The second error occurs in the Proposed Order on page 12, near lines eight through ten, which  
12 currently reads: "Close of Fact Discovery (including completion of independent medical examinations  
13 of Plaintiffs." The parties revise the foregoing to read "Close of Fact Discovery."

14 The parties apologize for these errors. In accordance with Civil Local Rule 5-1(f), the parties will  
15 submit an updated Case Management Statement and Proposed Order in standard word processing format  
16 to the Court.

17 Dated: May 15, 2023

PILLSBURY WINTHROP SHAW PITTMAN, LLP  
/s/ Dustin Chase-Woods  
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